

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT,
LLC'S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO
EXCLUDE THE OPINIONS OF DRS. DAVID KESSLER, LAURA
PLUNKETT, WILLIAM SAGE AND GEORGE NEWMAN**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, "Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants' Memorandum of Law in Support of Motion to Exclude the Opinions of Drs. David Kessler, Laura Plunkett, William Sage and George Newman.

1. Attached hereto as **Exhibit 1** is a true and correct copy of relevant excerpts of the April 12, 2018 trial transcript in *Russell v. Janssen Pharmaceuticals, Inc.*, No. 150500362 (Pa. Ct. Com. Pl.).
2. Attached hereto as **Exhibit 2** is a true and correct copy of the transcript of the deposition of David A. Kessler in *In re Davol Inc./C.R. Bard, Inc. Polypropylene Hernia Mesh Product Liability Litigation*, MDL No. 2846 (S.D. Ohio, Jan. 31, 2020).
3. Attached hereto as **Exhibit 3** is a true and correct copy of the Amended Report of David A. Kessler, November 15, 2023, in this case.
4. Attached hereto as **Exhibit 4** is a true and correct copy the Third Amended Report of Laura M. Plunkett, May 28, 2024, in this case.
5. Attached hereto as **Exhibit 5** is a true and correct copy of the transcript of the deposition of Laura M. Plunkett, December 21, 2023, in this case.
6. Attached hereto as **Exhibit 6** is a true and correct copy of *Lloyd v. Johnson & Johnson*, No. BC628228 (JCCP No. 4872) (Cal. Super. Ct.) (Plaintiff Eva Echeverria only).
7. Attached hereto as **Exhibit 7** is a true and correct copy of the Amended Report of William Sage, November 15, 2023, in this case.
8. Attached hereto as **Exhibit 8** is a true and correct copy of the transcript of the deposition of William M. Sage, September 23, 2021, in this case.

9. Attached hereto as **Exhibit 9** is a true and correct copy of the transcript of the deposition of George Newman, May 15, 2024, in this case.
10. Attached hereto as **Exhibit 10** is a true and correct copy of the Report of George Newman, November 15, 2023, in this case.
11. Attached hereto as **Exhibit 11** is a true and correct copy of the transcript of the deposition of William M. Sage, April 1, 2024, in this case.
12. Attached hereto as **Exhibit 12** is a true and correct copy of the transcript of the deposition of Laura M. Plunkett, August 10, 2021, in this case.
13. Attached hereto as **Exhibit 13** is a true and correct copy of the transcript of the deposition of Laura M. Plunkett, December 19, 2018, in this case.
14. Attached hereto as **Exhibit 14** is a true and correct copy of the transcript of the deposition of David A. Kessler, April 8, 2024, in this case.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 23, 2024



Jessica Davidson